

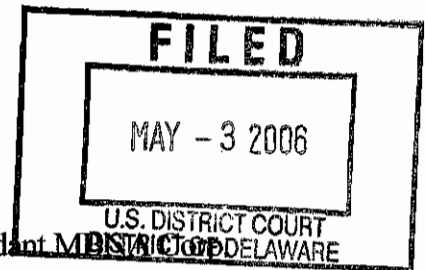
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**JANET LEIGH FRANKLIN, Plaintiff;**

**C.A. No. 04-1513 CMS**

**MBNA CORP., Defendant;**

**DEFENDANT'S FIRST SET  
OF INTERROGATORIES**



Pursuant to Rule 33 of the Federal Rules of Civil Procedure, defendant MBNA CORP. ("Defendant" or "MBNA") requests that you answer the following interrogatories under oath and serve a copy of your answers upon its undersigned attorneys within 30 days after the date of service upon you.

**DEFINITIONS**

For purposes of these interrogatories, the following terms have the following definitions, unless otherwise stated:

A. "You" and "your" includes plaintiff Janet Leigh Franklin and any and all persons or entities acting or purporting to act on her behalf, including without limitation her attorneys.

B. "Person" includes natural persons, firms, corporations and their divisions or subsidiaries, partnerships, associations, and other business entities.

C. "Identify," when used in reference to an individual, means to state: (i) his or her full name; (ii) his or her present or last known address and telephone number; and (iii) his or her present or last known business affiliation.

D. "Identify," when used in reference to a corporation, partnership, association, or other business entity, means to state: (i) its full name; and (ii) its present or last known address and telephone number.

E. "Identify," when used in reference to a document, means to state: (i) the type of document (e.g., letter, financial record, memorandum); (ii) its date and title, if any; (iii) its originator, if any; (iv) its addressee, if any; (v) its present location; (vi) the person or persons having possession, custody and/or control of it; and (vii) if any such document was but is no longer in your possession or custody or subject to your control, state what disposition was made of it.

F. The word "document" has the broadest meaning that can be ascribed to it pursuant to Rule 34 of the Federal Rules of Civil Procedure. Among other things, it refers to and includes the final form and all drafts and revisions of any type of written or graphic matter, original or reproduced, however produced or reproduced, of any kind and of every kind, and all copies thereof that are different in any way from the original, regardless of whether different by reason of any notation made on such copies or otherwise, or whether designated "confidential," "privileged," or otherwise restricted. Without limiting the generality of the foregoing, "document" includes correspondence, records, tables, memoranda, notes, diaries, statistics, communications, letters, telegrams, minutes, messages, contracts, reports, studies, ledgers, checks, statements, receipts, returns, summaries, pamphlets, books, journals, purchase orders, invoices, publications, inter-office and intra-office communications, notations, transcriptions, or printouts of any sort of conversations, telephone calls, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, telefax, invoices, work sheets, all drafts, oral records, or representations of any kind (including, without limitation, photographs, charts,

graphs, schedules, reports, drawings, data compilations, microfiche, microfilm, video tapes, recordings, motion pictures), and any electronic, mechanical, or electric records or representations of any kind (including without limitation, tapes, cassettes, discs, recordings, computer memories), or any other recorded information of any kind whatsoever, within your knowledge, possession, custody, control, or subject to your control, or accessible to you or your attorneys.

G. "Relate to," "related to" and "relating to" shall mean refer to, reflect, record, describe or be in any other way connected with the matter being discussed.

### **INSTRUCTIONS**

A. If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder, state whatever information or knowledge you have concerning the unanswered portion and detail what you did in attempting to secure the unknown information.

B. If you claim that any document, conversation, or other matter is protected by the attorney-client privilege or work-product doctrine, specifically identify each such document, conversation, or other matter, and state the facts and circumstances that you contend create an attorney-client privilege or work product protection.

C. If any of the documents identified in your answers to these interrogatories have been destroyed, or otherwise discarded, you are requested to identify the document destroyed or discarded in the same manner as identification is requested for "privileged" documents.

D. Your answers to these interrogatories must be supplemented as required by the Federal Rules of Civil Procedure.

**INTERROGATORIES**

1. Describe in detail the factual basis for your claim that the Plaintiff was not discriminated against.

**ANSWER:**

2. Identify each person acting on the Defendant's behalf who has investigated the facts alleged in Plaintiff's complaint, describe the information the Defendant has obtained by each such person, and identify each document relating to the subject matter of this action that was obtained by each such person.

ANSWER:

3. With respect to any experts you have retained for or specifically employed in

anticipation of litigation or preparation for trial, including experts whom you do not expect or have not yet decided whether to call as witnesses; identify each expert, the professional qualifications and experience of each expert, the substance of the facts and opinions about which each expert was consulted, and a summary of the grounds for each opinion given by each expert.

ANSWER:

**4. Identify each person whom you believe has knowledge of any fact that does not support the plaintiff's claim.**

**ANSWER:**

**5. For *each* person the Plaintiff has identified in the Witness List and response to the preceding interrogatory, set forth in detail not by Law but, is willing to take a polygraph test, to show what the Plaintiff is claiming is true and correct in supporting this lawsuit.**

**ANSWER:**



6. Describe all criminal, civil, and administrative actions (including, but not limited to, arbitration matters, grievance hearings, administrative proceedings, civil, criminal, family and bankruptcy court matters, and/or charges you have filed with any state's fair employment practices agency, the United States Equal Employment Opportunity Commission, the Office of Federal Contract Compliance Programs, and/or any other state or local human rights commission) to which your witnesses have been a party or witness, including, but not limited to, the identity of the parties, the date the action was brought or filed, the case number for the action, the court or administrative agency with which the action was brought or filed, the nature of the allegations upon which the action was based, and the outcome of the action.

ANSWER:

7. Identify every physician, psychologist, therapist, social worker, and other health care professional who the Defendant has received, examined or treated the Plaintiff during the past 10 years and describe all treatments and examinations that the Defendant received from each health care professional, including dates of, purpose for, and diagnosis and prognosis received at each such treatment and examination.

ANSWER:

**8 . Identify each person with whom you or any person acting on the Defendant's behalf spoken or met regarding claims against (Plaintiff) and for each such person give a brief description of the knowledge or information that you believe the person has, and identify all documents of evidence, summarize, refer or relate to any such conversations and/or meetings.**

**ANSWER:**

**9. For each person you may call as an expert witness: (a) state each person's name, home address and telephone number, and business address and telephone number; (b) identify each person's professional qualifications and experience, including educational background and experience, employment background and experience, and any published work; and (c) provide a complete and detailed statement of the facts and opinions to which each person is expected to testify.**

**ANSWER:**

*Janet L. Franklin*  
(pro se)

**JANET LEIGH FRANKLIN**

**302-222-0986**

**Dated: May 1, 2006**